

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Bridging the Digital Divide for Low-Income Consumers)	WC Docket No. 17-287
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	

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I. INTRODUCTION AND SUMMARY

General Communication, Inc. (“GCI”) files these comments in response to the Commission’s Notice of Proposed Rulemaking on bridging the Digital Divide through the Lifeline program.¹ Through its operating subsidiaries, GCI offers facilities-based fixed and mobile wireless Lifeline services throughout Alaska. GCI supports the Commission’s goal of encouraging investment and deployment of modern broadband networks; through the Alaska Plan, GCI has committed to bring fixed broadband service of 10/1 Mbps to over 8,500 locations in remote Alaska² and to newly offer LTE service to over 100,000 remote Alaskans.³

While broadband deployment in underserved areas like remote Alaska is a goal that GCI shares—and is implementing—GCI encourages the Commission not to lose sight of the practical effects its decisions could have on low-income Americans, particularly those in areas not yet served with robust fixed and mobile broadband networks. These areas are the most isolated and difficult to serve. Lifeline-eligible customers in these areas should continue to be able to receive Lifeline-supported service, and should not be cut off simply because the networks in their areas

¹ *Bridging the Digital Divide for Low-Income Consumers et al.*, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, 32 FCC Rcd. 10,475, 10,495–515 ¶¶ 53–118 (2017) (“*Digital Divide Order*” or “*Digital Divide NPRM*”).

² “Remote Areas in Alaska” is defined in the Commission’s high-cost rules as “all of Alaska except” the “ACS–Anchorage incumbent study area,” the “ACS–Juneau incumbent study area,” the “fairbankszone1 disaggregation zone in the ACS–Fairbanks incumbent study area,” and the “Chugiak 1 and 2 and Eagle River 1 and 2 disaggregation zones of the Matanuska Telephone Association incumbent study area.” 47 C.F.R. § 54.307(e)(3)(i).

³ *See generally* Letter from Julie A. Veach, Counsel, General Communication, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 16-271 (filed Nov. 29, 2016) (submitting updated mobile performance commitments); Letter from Julie A. Veach, Counsel, General Communication, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 16-271 (filed Nov. 29, 2016) (submitting updated performance commitments on behalf of United Utilities, Inc. and Yukon Telephone Company, Inc.).

are not yet capable of providing broadband that meets the Commission’s standards. Specifically, the Commission should end the phase-out of support for voice-only services, which would leave no Lifeline option for eligible consumers who happen to live in areas that do not yet have fixed or mobile networks capable of delivering broadband services meeting the Commission’s minimum requirements; some consumers may have the choice of one Lifeline broadband service, others may have none. In either case, their choice of technology should not be limited by regulation. Relatedly, GCI encourages the Commission not to limit Lifeline services to those provided over “broadband-capable networks” if doing so would remove Lifeline service as an option for consumers in areas not yet served by such networks. Finally, the Commission can adopt process reforms that mitigate abuse of the Lifeline program but do not overburden subscribers or eligible telecommunications carriers (“ETCs”).

II. THE COMMISSION SHOULD END THE VOICE-ONLY PHASE-OUT IN REMOTE ALASKA

In the *2016 Lifeline Order*, the Commission decided to phase out Lifeline support for voice-only service, i.e., service without data meeting the minimum broadband data requirements.⁴ The current rules gradually phase out Lifeline support for voice-only service through December 1, 2021, by eliminating support in three annual reductions.⁵ The Commission adopted this gradual phase-out with the thought that “a forward-looking Lifeline program must focus on broadband services” in order to “achieve [the] goals of providing low-income

⁴ *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962, 4038 ¶ 117 (2016) (“*2016 Lifeline Order*”).

⁵ 47 C.F.R. §§ 54.403(a)(2)(i)–(iv).

consumers with robust, affordable, and modern service offerings.”⁶ The concern was that “continuing to support a voice-only service would artificially perpetuate a market with decreasing demand and incent Lifeline providers to . . . avoid providing low-income customers with modern services as Congress intended.”⁷ Recognizing, however, the need to retain or adopt certain measures “to continue addressing the affordability of voice service,” particularly given the non-uniform adoption of new technologies, the Commission created an exception to the voice-only phase-out, which preserves the final reduced support amount of \$5.25 per month (plus any applicable Tribal support) for the provision of voice-only services by a provider that is the only Lifeline provider in a census block.⁸

In the *Digital Divide NPRM*, the Commission correctly observes that the phase-out of support for voice services could prevent low-income consumers in rural areas from obtaining quality, affordable voice service and seeks comment on discarding the phase-out in rural areas.⁹ For the reasons detailed below, GCI strongly supports jettisoning the phase-out, particularly in rural Tribal areas. Instead, the Commission should maintain current support levels for voice-only service. Continuing the phase-out of support for voice-only service will jeopardize the ability of some eligible consumers to obtain any Lifeline service at all and prevent others from obtaining the service that best meets their needs.

⁶ 2016 Lifeline Order at 3981 ¶ 52; see also *Digital Divide NPRM* at 10,501 ¶ 74.

⁷ *Id.* at 3984 ¶ 57.

⁸ *Id.* at 4003–04 ¶¶ 118–19 (codified at 47 C.F.R. § 54.403(a)(2)(v)).

⁹ *Digital Divide NPRM* ¶ 76.

A. The Voice-Only Phase-Out Would Leave Some Remote Alaskans with No Lifeline

In many parts of remote Alaska—and possibly in other rural areas in the Lower 48—broadband service that meets the minimum standards is not yet available and is unlikely to be available by December 1, 2021, when voice-only service is no longer eligible for Lifeline support.¹⁰ Currently in these areas, standalone voice service is the only available Lifeline-qualified offering in some areas; once the phase-out takes full effect, some consumers will lose either a fixed Lifeline option or a mobile Lifeline option; others will lack any Lifeline option.

The current voice-only phase-out applies to “standalone voice service, or voice service not bundled with broadband [that] meets the minimum standards.”¹¹ The minimum standards currently require 3G mobile technology or better with 1GB of monthly usage and, for fixed services, 15/2 Mbps or higher speeds with 250 GB of monthly usage.¹² These minimums will increase over time.¹³ If a fixed provider does not offer any service in a given area that meets the current speed and usage requirements, it can “receive Lifeline funds for the purchase of its highest performing generally available residential offering” that provides speeds of at least 4/1 Mbps.¹⁴

¹⁰ 47 C.F.R. § 54.403(a)(2)(iv).

¹¹ *Id.*

¹² *Id.* § 54.408(b)(1)-(2); *Wireline Competition Bureau Announces Updated Lifeline Minimum Service Standards and Indexed Budget Amount*, Public Notice, 32 FCC Rcd. 5087, 5087–88 (Wireline Comp. Bur. 2017).

¹³ The standards will be reviewed annually, although the stepwise increases for mobile wireless broadband standards have been set through November 30, 2019. *See* 47 C.F.R. § 54.408(b)(2)(ii)(C) (establishing mobile wireless standards for Dec. 1, 2018 through Nov. 30, 2019); § 54.408(c) (establishing mechanisms for updating standards).

¹⁴ *Id.* § 54.408(d).

Many remote Alaska areas are not yet served by broadband networks that meet even today's minimum standards. Based on the most recently available Form 477 data, GCI estimates that remote Alaska has at least 20,000 residents who live in areas that are served by a 2G or voice-only mobile wireless network, and that nearly 10,000 additional remote Alaskans lack any mobile wireless service at all.¹⁵ Similarly, over 65,000 Alaskans lack access to a fixed broadband network providing at least 4/1 Mbps speeds. As many as 25,000 Alaskans live in areas that lack either 3G or better or a wireline network offering 4/1 Mbps or faster speeds. For these consumers, the current trajectory takes away any option for Lifeline service starting December 2021, unless they happen to live in a census block with only one Lifeline provider.

Continuing with the voice-only phase-down in these areas would therefore leave Lifeline-eligible consumers with no option for Lifeline service, jeopardizing access to *all* communications services, including basic voice and 911. This is a particularly harsh result in this part of the country, and inconsistent with the approach to rural network upgrades taken in the Alaska Plan. Many communities are separated from one another by vast distances, not even connected by the road system.¹⁶ Substantial populations continue to rely on subsistence or seasonal hunting and fishing, which can take them away from villages for extended periods of

¹⁵ GCI bases its estimates on an analysis of Form 477 data. For mobile wireless estimates, we use the centroid method, assuming that if the centroid of a census block lacks coverage, none of the population associated with that census block has access to mobile wireless service. GCI did not include data from satellite providers in its analysis; to the best of our knowledge, no satellite provider offering service to Alaskans participates in the Lifeline program.

¹⁶ "In Alaska, the majority of municipalities are not connected to the road system (86%)."
Alaska Dep't of Commerce, Alaska Mapping Business Plan: Integrating Mapping, Risk Assessment, and Resilience Planning, Appx. 2 at 48 (2017), *available at* <https://www.commerce.alaska.gov/web/Portals/4/pub/AMBPA2.pdf>.

time.¹⁷ Mobile services are particularly important for low-income consumers who depend on activities that take them away from home, and the Alaska Plan provides a reasonable path for network upgrades supported by high-cost support. Basic voice communications continue to connect people with each other and the outside world and should not be cast aside as old-fashioned and no longer important. Indeed, Congress specifically instructed that “[c]onsumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services.”¹⁸ There is no exception in the statute for remote Alaskans.

B. Alaska Plan Commitments Ensure That Supporting Voice Services Will Not Discourage Broadband Deployment

The Commission articulated the important goal of ensuring that its universal service policies promote investment in broadband networks.¹⁹ GCI supports this goal. It is not the case, however, that continuing to support voice services in remote Alaska will reward the status quo or discourage investment and deployment.

The Alaska Plan ensures that participating ETCs will forge ahead with broadband investment. Alaska Plan participants receive a fixed level of funding for a 10-year term in

¹⁷ E.g., U.S. Dep’t of Interior, *Federal Subsistence Management Program*, <https://www.doi.gov/subsistence> (last visited Jan. 23, 2018); Alaska Dep’t of Labor & Workforce Dev., *Commercial Fishing Employment*, Alaska Economic Trends, at 5 tbl.2 (Nov. 2017), available at <http://labor.state.ak.us/trends/nov17.pdf> (noting seasonal employment numbers for fishing); North Pacific Seafoods, *Employment: Working for NPS* <http://northpacificseafoods.com/content/view/47/361/> (last visited Jan. 23, 2018) (noting seasonal dates for various plants at one fishing company).

¹⁸ 47 U.S.C. § 254(b)(3).

¹⁹ *Digital Divide NPRM* at 10,498 ¶ 65.

exchange for committing to individually-tailored performance plans.²⁰ Participating carriers have committed to improve fixed broadband services at over 60,000 locations and bring LTE collectively to over 120,000 residents within their respective services areas in remote Alaska.²¹

With these commitments in place, the danger that Lifeline support would allow participating providers to offer “second-tier service” is simply not present.²² The Commission has approved the commitments to meet standards that are realistic given the unique circumstances of remote Alaska. Providers that have committed to deploy cannot now change their minds without facing substantial penalties.²³

Moreover, in adopting the incentive-based Alaska Plan, the Commission recognized the difficulties inherent in establishing better service in remote Alaska, including the difficult terrain therein and the lack of access to terrestrial backhaul.²⁴ Continuing the voice-only phase-out in remote Alaska is at odds with the Commission’s prior recognition of these difficulties. Alaska’s

²⁰ *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd. 10,139, 10,142 ¶ 6 (2016) (“*Alaska Plan Order*”).

²¹ *See Wireline Competition Bureau Authorizes Alaska Plan Support for 13 Alaska Rate-of-Return Companies*, Public Notice, 31 FCC Rcd. 13,347 (Wireline Comp. Bur. 2016); *Wireless Telecommunications Bureau Approves Performance Plans of the Eight Wireless Providers that Elected to Participate in the Alaska Plan*, Public Notice, 31 FCC Rcd. 13,317, Appx. A at 13,321–32 (Wireless Telecomm’n Bur. 2016) (“*Wireless Commitments Approval PN*”). While some participants—not GCI or its affiliates—committed only to maintain service, the Commission approved their individually tailored performance plans based on their unique circumstances.

²² *2016 Lifeline Order* at 4002 ¶ 111.

²³ *See* 47 C.F.R. § 54.320 (establishing reporting obligations and penalties for failure to meet deployment milestones).

²⁴ *Wireless Commitments Approval PN* at 13,318 n.7; *see also Alaska Plan Order* at 10,140 ¶ 1 (finding the plan in the public interest because of “the unique climate and geographic conditions of Alaska”).

low-income consumers needing voice services should not be penalized because their state's challenges slow the deployment of broadband networks.

C. Some Lifeline-Eligible Consumers May Need to Put Their Lifeline Support Toward Voice Service

The Commission states in the *Digital Divide NPRM* that “it is unclear whether low-income consumers would be able to obtain quality, affordable voice service in rural areas without Lifeline support.”²⁵ GCI agrees that Lifeline support for voice service in remote Alaska continues to provide an essential benefit.

First, as the Commission observed, fixed voice service can be relatively costly in rural areas. The reasonable comparability benchmark for voice services is \$45.38.²⁶ Alaska's rural local exchange carriers charge a range of rates for local service up to the benchmark rate, which, as the Commission notes, is “almost double the average urban rate.”²⁷ In addition to the local rates, remote Alaskans have a unique need for *toll* services: local calling areas tend to be limited to a single community, but an interexchange carrier handles calls that, in the Lower 48, would often be included in the local calling area.²⁸ Thus, “basic” voice service in remote Alaska should include a reasonable amount of toll service, thereby driving up the cost to consumers.

Second, remote Alaskans lack access to over-the-top Voice over Internet Protocol (“VoIP”) services that is equivalent to the affordable voice access available in the Lower 48. Over-the-top VoIP services require a broadband connection—something as of yet unavailable to

²⁵ *Digital Divide NPRM* at 10,502 ¶ 76.

²⁶ *Id.*

²⁷ *Id.*

²⁸ *See, e.g.,* Comments of General Communication, Inc. at 3 & n.3, WC Docket Nos. 17-244, 13-97 (filed Dec. 27, 2017).

many remote Alaskans.²⁹ Where those broadband connections are available, they can be expensive even *with* Lifeline support. As explained in the Alaska Telephone Association’s petition for clarification and waiver,³⁰ permitting fixed providers that lack a network meeting the minimum standards in a given area to offer for Lifeline support only their “highest performing generally available residential offering” means that low-income consumers can only receive the Lifeline discount on services that cost as much as \$300 per month.³¹ Under this rule, at any level of support—\$9.25, \$7.25, or \$5.25 per month, with an additional \$25 per month in rural Tribal areas³²—fixed broadband services are undoubtedly cost-prohibitive for low-income remote Alaskans. Thus, over-the-top VoIP services also are out of reach.

To the extent that the Commission is concerned that support for voice-only service will lead to waste, fraud, and abuse by encouraging ETCs to overcharge, the Commission need only look to its existing rules. Current rules prohibit a carrier from receiving Lifeline support reimbursements that exceed the carrier’s non-Lifeline rate for that offering or similar offerings.³³ So, for example, if the retail cost of an ETC’s voice offering in a rural Tribal area is \$30, the ETC may not claim more than \$30 in Lifeline support—\$9.25 plus \$20.75 in rural Tribal

²⁹ See *supra* at 4-5.

³⁰ Alaska Telephone Association Petition for Clarification and Waiver of Lifeline Minimum Service Standards at 6–7, WC Docket Nos. 11-42, 09-197, 10-90 (filed Dec. 4, 2017).

³¹ See *Bristol Bay Internet*, Bristol Bay Telephone Cooperative, <http://www.bristolbay.com/internet.html> (last visited Jan. 8, 2018) (offering 6/1 Mbps with 100 Gigabytes/month for \$195); *Internet Packages and Pricing Will Change!*, Nushagak Cooperative, <http://www.nushtel.com/PDF/102317.pdf> (last visited Jan. 8, 2018) (offering same for \$165); *UUI Internet Service*, United Utilities, <http://www.uui-alaska.com/internet/> (last visited Jan. 8, 2018) (offering same for \$300).

³² 47 C.F.R. § 54.403(a)(2)-(3).

³³ *Id.* § 54.407(b).

support. This rule ensures that carriers would not be overcompensated for the Lifeline services they provide even if the maximum support amounts remain the same.

In sum, the Commission should recognize the needs of remote Alaskans for basic communication and continue to provide Lifeline support for voice services, especially in areas that lack broadband networks.

III. THE COMMISSION SHOULD CLARIFY THAT LIFELINE VOICE CAN BE PROVIDED OVER A TELECOMMUNICATIONS SERVICES NETWORK

Relatedly, the Commission also seeks comment on its proposal to “limit[] Lifeline support to facilities-based broadband service provided to a qualifying low-income consumer over the ETC’s voice- and broadband-capable last-mile network.”³⁴ The Commission appears to have three goals in limiting Lifeline support in this way. First, the Commission “believe[s] Lifeline support will best promote access to advanced communications services if it is focused to encourage investment in broadband-capable networks.”³⁵ Second, the Commission proposes to limit participation in the Lifeline program to ETCs that own their last-mile facilities.³⁶ Third, the Commission notes that in the context of the Connect America Fund, the Commission relied on its authority under Section 254(e) to extend high-cost support to broadband-capable networks without adding broadband Internet access service to the list of supported services, and seeks comment on whether a similar approach would be appropriate in the Lifeline context.³⁷

To the extent that the Commission agrees to continue to provide Lifeline support for voice-only services at least in some circumstances, GCI urges the Commission not to limit that

³⁴ *Digital Divide NPRM* at 10,498-99 ¶¶ 65–66.

³⁵ *Id.* at 10,498 ¶ 65.

³⁶ *See id.* at 10,499 ¶ 67.

³⁷ *See id.* at 10,503 ¶ 78.

support to voice services provided over a “voice- and broadband-capable last-mile network.”³⁸

Doing so would vitiate a decision to continue to provide support for voice services where broadband networks are not available or not sufficiently robust to meet any Commission minimum requirements. Voice service in areas without broadband cannot be provided over “voice- and broadband-capable last-mile networks.”

In addition, limiting Lifeline support for voice services to those provided over a broadband-capable network is not necessary to achieve the Commission’s aims. First, the Commission does not need to tie its funding to the type of network to solidify its legal authority; the Commission has ample legal authority to support voice services in the Lifeline program, relying on its traditional authority to define universal service as “an evolving level of telecommunications service.”³⁹ Second, the Commission can continue to require in the voice context that services be provided over the ETC’s own last-mile network—GCI takes no position on whether Lifeline support should be limited to facilities-based ETCs.

And third, in remote Alaska, the Commission need not limit support to broadband-capable networks in order to spur investment in modern networks. As explained above, the Alaska Plan participants have already made specific, enforceable commitments that will expand and improve broadband service. Continuing to fund voice as a Lifeline service will have no

³⁸ *Id.* at 10,498 ¶ 65.

³⁹ 47 U.S.C. § 254(c); *see also Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd. 17,663, 17,687 ¶ 62 (2011) (subsequent history omitted) (“To the extent carriers offer traditional voice telephony services as telecommunications services over traditional circuit-switched networks, our authority to provide support for such services is well established.”); *see also id.* at 17,685 ¶ 63 (deciding to support interconnected VoIP services as well as traditional voice telecommunications services whether or not they are classified as telecommunications services).

effect on those commitments at all, yet will provide benefits to low-income Alaskans, particularly those who do not yet have access to broadband.

Thus, as a corollary to ending the voice-only phase-out for remote Alaskans, the Commission should be clear that their services can continue to be funded whether or not they are provided over a broadband-capable network.

IV. PROCESS REFORMS CAN PREVENT ABUSE WITHOUT PUTTING UNREASONABLE BURDENS ON PARTICIPANTS

GCI also supports the Commission’s efforts to address waste, fraud, and abuse in the Lifeline system by improving certain processes for validation of eligibility. For example, GCI agrees that Lifeline sales staff—particularly those receiving commissions—should not perform the final review and verification of a subscriber’s eligibility to participate in the Lifeline program.⁴⁰ For years, GCI has used separate personnel to perform these functions to ensure that the eligibility of all its Lifeline subscribers is confirmed by a neutral and unbiased company employee. Nonetheless, some of the Commission’s proposals appear to overreach or impose an unnecessarily large burden on subscribers and providers. GCI addresses some of these issues and suggests alternatives that can further the Commission’s goals without placing unreasonable burdens on Lifeline actors.

Lack of postal addresses. GCI encourages the Commission not to jeopardize the ability of Alaska’s ETCs to enroll subscribers without standardized postal addresses. In asking for comment on restricting or eliminating the ability of ETCs to “override” Lifeline enrollment requirements, the Commission notes that consumers have access to a dispute resolution process if, among other errors identified by the National Lifeline Accountability Database (“NLAD”),

⁴⁰ See *Digital Divide NPRM* at 10,507 ¶ 94.

the consumer's address is not recognized by the United States Postal Service ("USPS").⁴¹ GCI supports the Commission's overarching goal of eliminating waste, fraud, and abuse in the Lifeline program and understands the related need to cross-reference and verify subscribers' residential locations. However, many remote Alaskans do not have conventional USPS addresses. As the Commission noted with regard to subscribers on rural Tribal lands, many subscribers do not have conventional postal addresses but rely on post offices boxes or rural route numbers.⁴² ETCs should continue to be able to use (and document) descriptive addresses.

USAC Review of Supporting Documents for Manual NLAD Dispute Resolutions.

Relatedly, GCI encourages the Commission not to adopt changes to the manual NLAD dispute resolution process that would delay support to or put additional paperwork burdens on subscribers, causing them to fall out of the program.⁴³ Currently, if the NLAD is unable to verify a potential subscriber's identity, the ETC may obtain documentation from the consumer and process the dispute resolution. The Commission seeks comment on requiring USAC to manually review the subscriber's documentation to increase accountability.⁴⁴

GCI understands the need to ensure that the dispute resolution process is conducted with integrity. GCI is concerned, however, that requiring USAC to conduct a manual document review of every subscriber that fails any part of the NLAD screening process before the subscriber begins receiving service would cause substantial delays to the subscriber as well as the ETC. The Commission could obtain similar results by allowing ETCs to begin providing

⁴¹ *Id.* at 10,509 ¶ 100.

⁴² *See id.* at 10,483 ¶ 20.

⁴³ *See id.* at 10,507-08 ¶¶ 95-96.

⁴⁴ *Id.* at 10,507 ¶ 96.

Lifeline-supported service to the customer pending USAC’s review of the documentation, subject to true-up if the customer ultimately is found not to be eligible.

Independent Economic Household Worksheets. GCI also encourages the Commission not to adopt two proposed changes to the Independent Economic Household (“IEH”) worksheet process. First, the Commission seeks comment on prohibiting ETCs from using IEH worksheets until the NLAD or a state administrator notifies the ETC that there is an existing Lifeline subscriber at the same address.⁴⁵ GCI understands that submitting IEH worksheets to USAC in every situation identified by the current rules⁴⁶ can overwhelm USAC and impede its ability to monitor improper activity. However, obtaining paperwork from subscribers after they have already enrolled in Lifeline service can be challenging. Some subscribers reside in homeless shelters or other institutions where incoming paperwork is more likely to be overlooked; others have a difficult time responding even if they actually receive the paperwork. To balance these concerns, GCI recommends that the Commission continue to permit ETCs to *collect* IEH worksheets in the situations identified by the current rules, but require them to *submit* the worksheets to USAC only when so requested because NLAD has identified a duplicate address. This proposal mitigates excessive data in the system and the associated burden on NLAD, but respects the difficulties ETCs can experience in timely obtaining subscriber eligibility information.

In addition, the Commission asks whether potential subscribers living in “multi-person residences” should be required to obtain a certification from their facility manager confirming

⁴⁵ *Id.* at 10,508-09 ¶ 98.

⁴⁶ 47 C.F.R. § 54.410(g) (requiring completion of the form upon initial enrollment and, in certain situations, at recertification).

that they actually live there and are not part of the same economic unit as any other resident receiving Lifeline support.⁴⁷ GCI encourages the Commission not to adopt such a requirement. First, this proposal is overbroad in that it subjects applicants to an additional obligation even when another Lifeline subscriber does not reside at the same address. Second, it would impose a new and, in some cases, administratively challenging burden on multiple-household facilities. The facility manager may not know whether other Lifeline subscribers reside at the facility or whether the applicant is part of the same economic household as an existing Lifeline subscriber. To enable an applicant to comply with this request, then, facilities would need to seek this information from all residents and update it on a regular basis. That may be difficult or impossible—residents may come and go, thwarting efforts to maintain an accurate list.

Documentation at Recertification. GCI encourages the Commission not to require existing subscribers to document their continued eligibility in the Lifeline program at every recertification.⁴⁸ Rather than burden subscribers with additional paperwork, GCI encourages the Commission to move forward with the National Verifier. Once fully operational, the National Verifier should moot the need for subscribers to prove their continued eligibility, as it will be able to make that determination directly with the participating programs.

⁴⁷ *Digital Divide NPRM* at 10,509 ¶ 99.

⁴⁸ *Id.* at 10,508 ¶ 97.

V. CONCLUSION

Voice service continues to be relevant and in some parts of remote Alaska may be the only communications option for a Lifeline-eligible consumer. GCI encourages the Commission to end the phase-down of Lifeline support for voice-only services and to undertake effective process reforms that do not unnecessarily burden subscribers or ETCs.

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